

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, INC.,

Plaintiff,

v.

SMARTDEVIL INC.,

Defendants.

C.A. No. 07-787-SLR

**REDACTED
PUBLIC VERSION**

**DECLARATION OF RYAN M. CORBETT, ESQ.
IN SUPPORT OF GIRAFA.COM, INC.'S MOTION FOR ENTRY OF DEFAULT
JUDGMENT AGAINST DEFENDANT SMARTDEVIL, INC.**

I, Ryan M. Corbett, hereby declare:

1. I am an associate in the law firm of Sughrue Mion, PLLC, counsel for Girafa.com, Inc. ("Girafa"). I submit this declaration in support of Girafa's Motion For Entry Of Default Judgment Against Defendant Smartdevil, Inc. I have personal knowledge of the facts set forth in this declaration, and, if called upon as a witness, I could and would testify to such facts under oath.

2. Attached hereto as Exhibit A is a true and correct copy of the Expert Report Of Dr. Brad A. Myers On Infringement, dated February 13, 2009.

3. Attached hereto as Exhibit B is a true and correct copy of a Claim Chart prepared by Dr. Brad Myers comparing the asserted claims to Smartdevils' products (Exhibit G to the Expert Report of Dr. Brad A. Myers on Infringement), dated February 13, 2009.

4. Attached as Exhibit C is a true and correct copy of Girafa's Trial Counsel bills for October, November, and December, 2009, as well as billing records for January 2010. The amount of attorney fees Girafa has incurred for preparing Girafa's Motion For Entry Of Default Judgment Against Defendant Smartdevil, Inc. and supporting documents is \$16,636.00.

5. The costs for filing this action against Smartdevil include a \$350.00 filing fee and a \$140.00 process server fee, which total \$490.00.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 21, 2010

Respectfully submitted,



Ryan M. Corbett

EXHIBIT A

EXPERT REPORT OF DR. BRAD A. MYERS ON INFRINGEMENT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, Inc,

Plaintiff,

v.

C.A. No. 07-787



Smartdevil Inc.,



Defendants.

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H. [REDACTED]	28

Myers Report Exhibits:

Exhibit A:	CV of Brad A. Myers, Ph.D.
Exhibit B:	List of cases where Brad A. Myers has testified
Exhibit C:	List of Materials Considered by Brad Myers
Exhibit D:	[REDACTED]
Exhibit E:	[REDACTED]
Exhibit F:	[REDACTED]
Exhibit G:	Claim chart comparing the '904 patent to Smartdevil (Thumbshot) products
Exhibit H:	[REDACTED]
Exhibit I:	[REDACTED]
Exhibit J:	[REDACTED]
Exhibit K:	[REDACTED]
Exhibit L:	[REDACTED]
Exhibit M:	[REDACTED]
Exhibit N:	Screen shots used in Claim Charts

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I. Introduction

1. In this litigation, Girafa.com ("Girafa") has asserted that [REDACTED]
[REDACTED]
[REDACTED] Smartdevil Inc., [REDACTED] have infringed
(literally and/or under the doctrine of equivalents) various claims of US patent 6,864,904 ("904
patent") assigned to Girafa.

2. The '904 patent was filed on Nov. 8, 2000, and claims priority from Provisional
Application Ser. No. 60/169,328, filed Dec. 6, 1999 (see '904 patent at (60) and col. 1, lines 5-6).

3. I previously submitted two other reports in this matter: DECLARATION OF DR.
BRAD A. MYERS on March 12, 2008, and REBUTTAL DECLARATION OF DR. BRAD A.
MYERS on July 3, 2008. Those reports and their exhibits are incorporated herein by reference.

4. I have been retained as a technical expert in this case by Girafa.com to address
infringement and validity issues. I am being compensated for the time that I spend consulting in
this matter at \$400/hour. This compensation is not dependent on the outcome of the case. I have
no personal interest in this litigation.

II. Summary of Opinions

5. Based on my understanding of the patent and its claims, and my analysis of the
various products with the information available to me at this time, I believe that certain products
do infringe the '904 patent.

6. [REDACTED]
[REDACTED]

7. [REDACTED]
[REDACTED]

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8. [REDACTED]

9. I believe that **Smartdevil** (Thumbshots) from Smartdevil Inc. infringes claims 1, 4, 6, 7, 12, 13, 14, 18, 21, 23, 24, 29, 30, 31, 35, 38, 40, 41, 42, 44, 46, 49, 51, 52, and 53 of the '904 patent.

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

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III. My Qualifications

16. I am currently a Professor in the Human-Computer Interaction Institute, which is part of the School of Computer Science at Carnegie Mellon University. My areas of expertise include user interface design, user interface software, computer science, visual programming, handheld devices, and demonstrational interfaces.

17. I have been working in the field of user interfaces (also called Human Computer Interaction or "HCI") for over 25 years, and I am the author or editor of over 350 publications. I have been on the editorial board of five journals, including the premier journals in the field of HCI. I have been a consultant on user interface design and implementation to over 65 companies.

18. I received a Bachelor of Science in Computer Science and Engineering and Master of Science in Computer Science from the Massachusetts Institute of Technology ("MIT") in 1980. I received my Doctorate in Computer Science from the University of Toronto in 1987.

19. I worked at the Three Rivers Computer Corporation (later renamed Perq Systems Corporation) from 1980 to 1983 where I designed and implemented software, including one of the first commercial window managers.

20. Over the course of my career, I have authored multiple articles relating to, among other subjects, window management, handheld computing, user interface software, visualization, intelligent interfaces, and novel interaction techniques. In recognition of my contributions to research, I was selected as a Fellow of the Association for Computing Machinery ("ACM") in 2005, and elected to the "CHI Academy" by the Special Interest Group on Computer-Human Interaction ("SIGCHI") of the ACM in April 2004, as one of the top 25 "principal leaders of the field" of HCI. I have also received a number of "best paper" awards, for example at the International Conference on Software Engineering in 2005 and 2008, at the ACM SIGACCESS Conference on Computers and Accessibility in 2004, and at the ACM SIGCHI 2006 Conference on Human Factors in Computing Systems.

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21. I regularly teach courses on user interface design and software. In particular, I have taught a course on Human-Computer Interaction in eCommerce since 2001.

22. I am listed as an inventor on U.S. Patent No. 5,581,677, relating to interaction techniques for creating charts and graphs. I am also listed as an inventor on two pending patent applications, one relating to a more stable technique of entering text for handheld devices for people with muscular disabilities, and the other relating to a technique for debugging computer programs that displays a visualization to show why certain events happen in a program.

23. My qualifications for forming the opinions set forth in this report are listed in this section and in Exhibit A attached which is my *curriculum vitae*. Exhibit A also includes a list of my publications.

24. Exhibit B provides a listing of when I have testified as an expert at trial or in a deposition within the last four years.

IV. Report Preparation

25. In developing the opinions discussed in this report, I studied the '904 Patent, its prosecution history and the references cited during prosecution of the patent. I also operated the systems and software plugins and examined the websites discussed in this report. I also reviewed the "Complaint for Patent Infringement" filed on December 5, 2007, the depositions of various witnesses and the associated exhibits, reports from experts, the judge's MEMORANDUM ORDER, dated Dec. 9, 2008, and various letters from the attorneys. A list of these materials is attached as Exhibit C.

26. I reserve the right to supplement this report if necessary based on new information. In particular, I have analyzed the systems based on what I believe to be appropriate constructions of the claim terms, and when possible, the apparent proposed construction of the defendants. I reserve the right to supplement this report based on the final claim construction adopted by the court, if necessary.

EXPERT REPORT OF DR. BRAD A. MYERS ON INFRINGEMENT

V. Instructions

27. I am not an attorney. For the purposes of this report, I have been informed about certain aspects of the law that are relevant to my analysis and opinion. In formulating my opinions, I have taken into account the following principles of the law regarding patent infringement and validity, which I understand to be accurate statements of the law:

28. I understand that infringement involves a two-step analysis and that the first step is determining the proper construction of the asserted claims.

29. I have been instructed that ultimately claims are construed by the judge in light of how one of ordinary skill in the art would understand the claims. It is my understanding that what is to be considered includes the claims, the patent specification and drawings, and the prosecution history including any art listed by the Examiner or the applicant. It is my understanding that information external to the patent, including expert and inventor testimony and unlisted prior art, are to be considered in construing the claims only if ambiguities remain. However, expert testimony may be useful in helping to explain the technology. I further understand technical dictionaries, encyclopedias, and treatises may also be used in claim construction, as long as these definitions do not contradict any definition found in or ascertained by a reading of the patent documents.

30. I understand that the second step of the infringement analysis is determining whether the accused products contain the elements of the asserted claims. A product is covered by and, thus, infringes a patent claim if the product meets or embodies each and every limitation of the patent claim, either literally or under the doctrine of equivalents. A method claim is infringed when each of the recited steps are performed.

31. I understand that an accused product literally infringes if it contains every limitation of the claim. I further understand that the failure to meet a single limitation is sufficient to negate literal infringement of a claim.

32. It is my understanding that an accused product that does not literally infringe a claim may nonetheless infringe the claim under the doctrine of equivalents. It is my

EXPERT REPORT OF DR. BRAD A. MYERS ON INFRINGEMENT

understanding that, to establish infringement under the doctrine of equivalents, the accused product must be shown to include an equivalent for each claim limitation that is literally absent.

33. It is my understanding that infringement under the doctrine of equivalents may be established by showing that the elements of the accused product are substantially the same as the corresponding elements of the patented invention. I understand that if it is known at the time of infringement that two elements are interchangeable, then their differences may be insubstantial for purposes of the doctrine of equivalents.

VI. Person of Ordinary Skill in the Art

34. The patent says the field of the invention is "Internet methodologies and systems generally and more particularly to systems and methodologies for displaying information received over the Internet" (col. 1, lines 12-15). Thus, one of ordinary skill in the art would have a bachelor's degree in computer science or related degree or equivalent experience, and at least 2 years of experience in Internet technologies or user interface design.

VII. Overview of the Patent

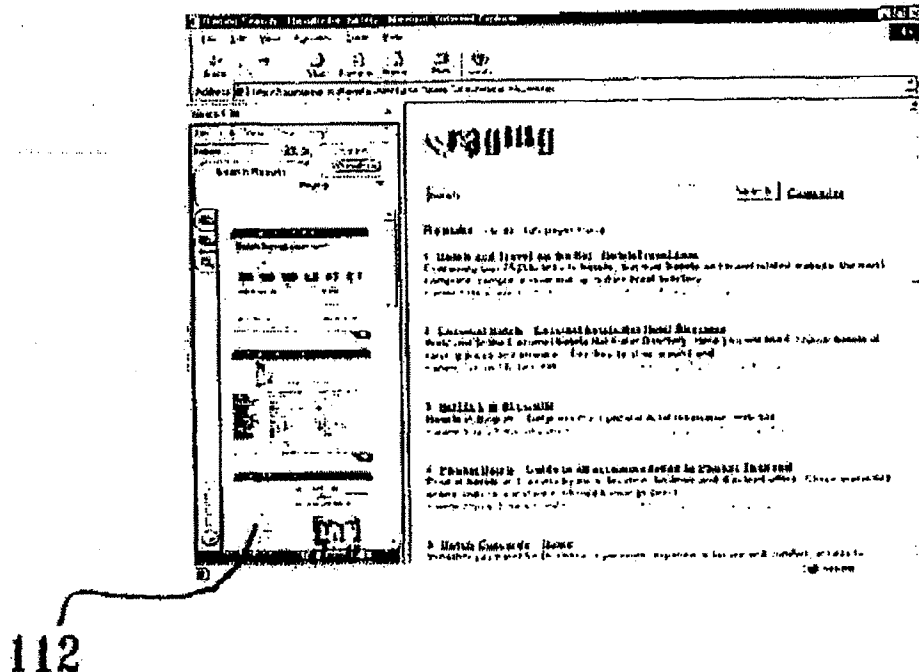
35. This patent describes a way to present a web page in a browser, and at the same time, present thumbnail images of other web pages that are hyperlinked from the web page. Some of the web pages are said to be comprised of HTML (e.g., col. 1, lines 66-67). HTML is the HyperText Markup Language, which is the predominant encoding for describing formatted text-based information for the web. HTML encodings can include static descriptions of page content with formatting information, references to images that will be included in the page, references called "hyperlinks" to other content that users can click on to view, and executable programs written in programming languages such as Javascript and Adobe's Flash. Web pages and each item referenced by the web page are named using a URL (Uniform Resource Locator).

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36. Users view web pages using software called a "browser", such as Internet Explorer or Apple Safari, which downloads web pages through the Internet. When the user requests a page, the browser renders the page by drawing what is described by the HTML, downloads the embedded pictures and rendering them when they arrive, and also runs the executable programs in the HTML. Some of the executable content may be used to respond to the user's interaction, such as moving and clicking the mouse.

37. There are at least three user interface embodiments described in the specification of this patent, and two implementation embodiments.

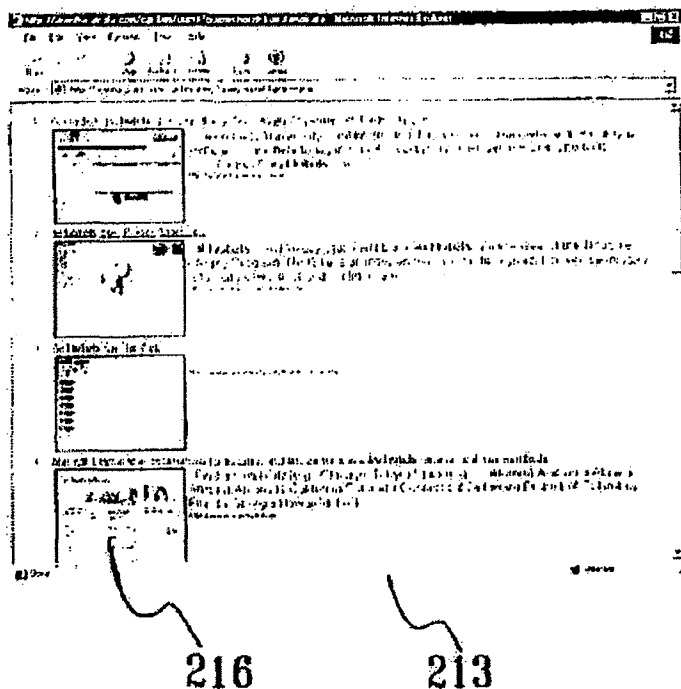
38. The first user interface embodiment is represented in FIG. 1 of the patent, and has the thumbnail pictures along side the original web page. This embodiment is explained at col. 5, lines 61-65: "to provide to a user, via the web browser 100, an annotated web page 110, which preferably includes the web page 101 having alongside it images 112 of homepages linked with web page 101."



Excerpt of FIG. 1

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39. The second embodiment is represented in FIG. 2 of the patent, and has the thumbnail pictures included in the web page, by modifying the html of the original web page to include the thumbnails. This embodiment is described in col. 6, lines 26-32: "The visualization functionality 206 is operative to embed within a dynamically generated web page, such as an HTML page, commands to the web browser 200 to download via the image server 210 from the image database 212 images of web pages which are referenced in hyperlinks contained in a web page 213 and to provide to a user, via the web browser 200, the web page 213 annotated to include therewithin images 216 of homepages linked therewith."



Excerpt of FIG. 2

40. The third embodiment has the thumbnail images pop-up on top of the image of the web page, so they appear to be hovering, like a pop-up window or pop-up menu. This embodiment is described in col. 6, lines 32-40: "It is also appreciated that either or both of the embodiments FIGS. 1 and 2 may provide images of web pages which are referenced in

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hyperlinks contained in a web page, which images hover either over or alongside the hyperlinks.”

41. There are also at least two implementation embodiments, differentiated by the placement of the “visualization functionality”, which “interfaces, typically via the Internet, with an image server ... to provide to a user, via the web browser 100, an annotated web page” (col. 5, lines 49-50, 62-63). In the first embodiment, shown in Fig. 1, the visualization functionality is placed with the web browser, and runs on the user’s machine (col. 5, lines 48-49). In the second embodiment, shown in Fig. 2, the visualization functionality is on a server machine, for example, a “web server [which] interfaces with a dynamic page generator ... in which is preferably installed a visualization functionality” (col. 6, lines 9-11).

42. In allowing the claims ‘904 patent, the examiner mentioned two elements that were missing from the prior art: the particular use of image servers, and for some claims, the display of home pages instead of the directly hyperlinked target webpages (see US patent 6,864,904 patent history at YH-GIRAF00000529-530).

43. The patent explains that the thumbnail images are provided by a *separate server* from the web server that provides the original web page. The separate image server is described in the specification at various places, including FIGS 1 and 2, and col. 6, lines 9-24.

44. In their letter to the examiner of June 10, 2004, the inventors say (p. 18): “The system and method of the present invention, as recited in claims 41 and 52, provide a separate web server and image server. According to the prior art method, wherein the image server and web server are combined, the web server and image server are each limited by the limitations of the other. Additionally, an image server provider would be required to adapt his technology to every web server. These limitations are not present in the system and method of the present invention. Additionally, the system and method of the present invention, which separates the

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image server from the web server, allows a single image server to capture and serve images of web pages from multiple web servers.” (‘904 patent history at YH-GIRAF A00000493).

45. Another important element (reflected in some but not all claims) is that the thumbnail image is not an image of the web page which is the target of the hyperlink. Instead, the image is of the *home page* of the site of the target web page. This is described in various places including col. 5, lines 59-65: “The visualization functionality 103 is operative to download via the image server 104 from the image database 106 images of web pages which are referenced in hyperlinks contained in the web page 101 and to provide to a user, via the web browser 100, an annotated web page 110, which preferably includes the web page 101 having alongside it images 112 of homepages linked with web page 101.” See also: col. 8, lines 4-7: “Each downloader 606 retrieves from the Internet, the homepage and the embedded objects corresponding to the URL supplied to it by the controller”. FIG. 4 and the discussion of col. 6, line 64 – col. 7, line 62 explains how to obtain the home page from the hyperlink URL.

46. In differentiating their invention from the prior art, the inventors emphasize this element: “While the applicant agrees that Miller teaches displaying thumbnails of documents, the applicant respectfully submits that Miller displays thumbnails of linked pages and does not show or suggest displaying thumbnails of **the home pages of the linked pages**, as recited in amended claims 1 and 21.” (‘904 patent file history at page YH-GIRAF A00000491, emphasis in original)

VIII. Claim Construction

47. In general, the terms in the asserted claims should have their plain and ordinary meaning. I have addressed some of these terms below. I reserve the right to provide further claim constructions and clarifications if necessary. In particular, I have analyzed the Snap products using Snap’s apparent proposed constructions, and the other products using the other defendants’ apparent proposed constructions. Should the court adopt Snap’s constructions or some

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construction that has not been proposed by any party, then I reserve the right to analyze the products using the court's constructions.

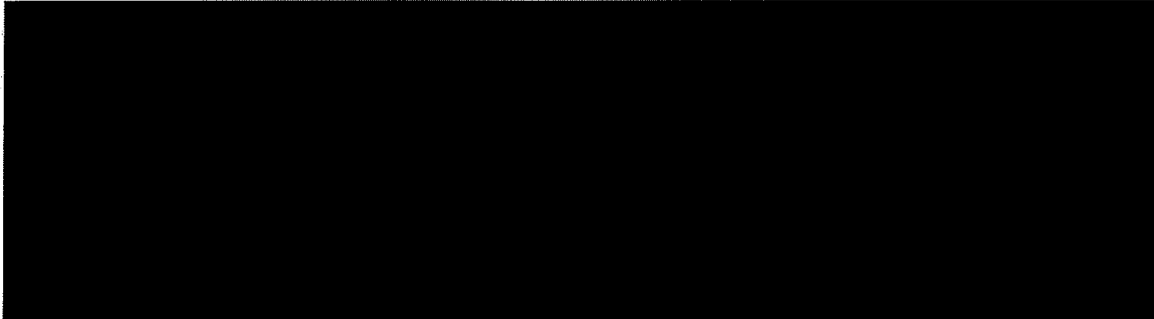
A. Thumbnail visual image

48. A "thumbnail visual image" is an image that is a smaller version of a larger image. Support for this construction is in the specification at col. 2, lines 53-54: "causing said thumbnail generator to shrink said rendered image of the web page". See also col. 9, lines 24-25: "This snapshot is resized to a desired thumbnail size."

49. 


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50. [REDACTED]



B. Image server

51. An “image server” is a type of server that stores and provides images. Support for this construction is provided in FIGS 1 and 2, and at col. 2, lines 7-8: “download via the image server from an image database images of web pages”. Further support is in the claims themselves. Claims 1, 18, 35 and 46, for example, say: “an image server that stores and provides said thumbnail visual image”.

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C. Home page

52. A “home page” is the main or front page of a web site. Support for this construction comes from the specification at FIG. 4 and col. 6, line 64 – col. 7, line 62.

D. “thumbnail visual image of the home page of at least one web site which is represented by said at least one hyperlink”

53. The thumbnail of the home page of a web site, where the hyperlink references a different web page that is part of that web site. When the hyperlink is to the home page itself, then the claims that use this clause do not apply.

E. Hyperlink

54. A “hyperlink” is an element on a web page that links to another place on that web page or to an entirely different web page. Support for this construction comes from the specification at col. 2, line 8: “web pages which are referenced in hyperlinks”.

F. Hovering over

55. When an image appears “hovering over” a web page, that image is displayed so that it looks like it is in a layer in front of the other content. Support for this construction comes from the specification at col. 6, lines 32-40.

G. Visualization functionality

56. “Visualization functionality” is software or hardware that enables or causes the thumbnail visual images to be provided to the user. Support for this construction comes from the specification at col. 5, lines 59-65: “The visualization functionality 103 is operative to download via the image server 104 from the image database 106 images of web pages which are referenced in hyperlinks contained in the web page 101 and to provide to a user, via the web browser 100, an annotated web page 110, which preferably includes the web page 101 having alongside it images 112 of homepages linked with web page 101”... Also, col. 5, lines 49:53: “the

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visualization functionality operates to embed commands to the web browser to download, via an image server, images of web pages which are referenced in hyperlinks contained in the web page and to provide to a user, via the web browser, an annotated web page.”

H. “Annotated Web Page”

57. [REDACTED]

[REDACTED]

I. “Multiplicity”

58. [REDACTED]

[REDACTED]

J. “Operative”

59. [REDACTED]

[REDACTED]

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K. “Thumbnail visual image of another web page of at least one web site which is represented by said at least one hyperlink”

60. 


L. “A web server, separated from said image server”

61. For claims that use this clause, the web server and the image server must be physically separate machines. Support for this construction comes from the specification where the image server and web server are described as separate Dell Power Edge Computers (“web server 202” 6:6-8, “image server 210” 6:16-17). Further, the inventors said during the prosecution that these machines were separate:

The system and method of the present invention, as recited in claims 41 and 52, provide a separate web server and image server. According to the prior art method, wherein the image server and web server are combined, the web server and image server are each limited by the limitations of the other. Additionally, an image server provider would be required to adapt his technology to every web server. These limitations are not present in the system and method of the present invention. Additionally, the system and method of the present invention, which separates the image server from the web server, allows a single image server to capture and serve images of web pages from multiple web servers. (‘904 patent history at YH-GIRAFA00000493, June 10, 2004 amendment, p. 18)

M. “At least partially concurrently”

62. This should be construed to mean “at least partially overlapping in time”.

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N. "Provides" and "Providing"

63. [REDACTED]

64. I do not believe that "providing" needs to be construed. However, if the court decides that "providing" needs to be construed, then a proper construction would be "displaying" or "making available to".

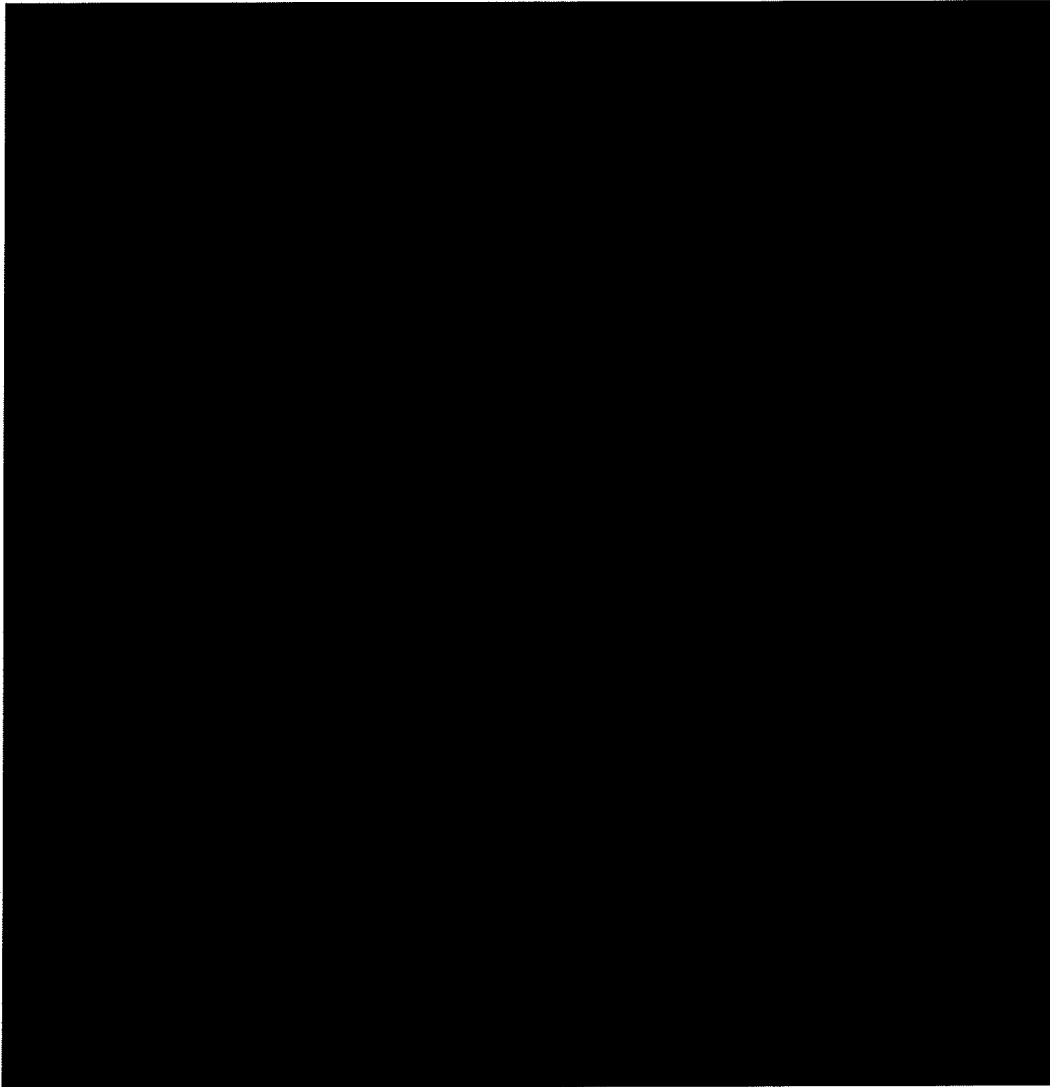
IX. Infringement Analysis

65. The infringement analysis presented below and in my detailed claim charts attached in Exhibits D through M are based on information that I have at this time, and I reserve the right to revise them to add or remove claims and evidence as new information becomes available.

A. [REDACTED]

66. [REDACTED]

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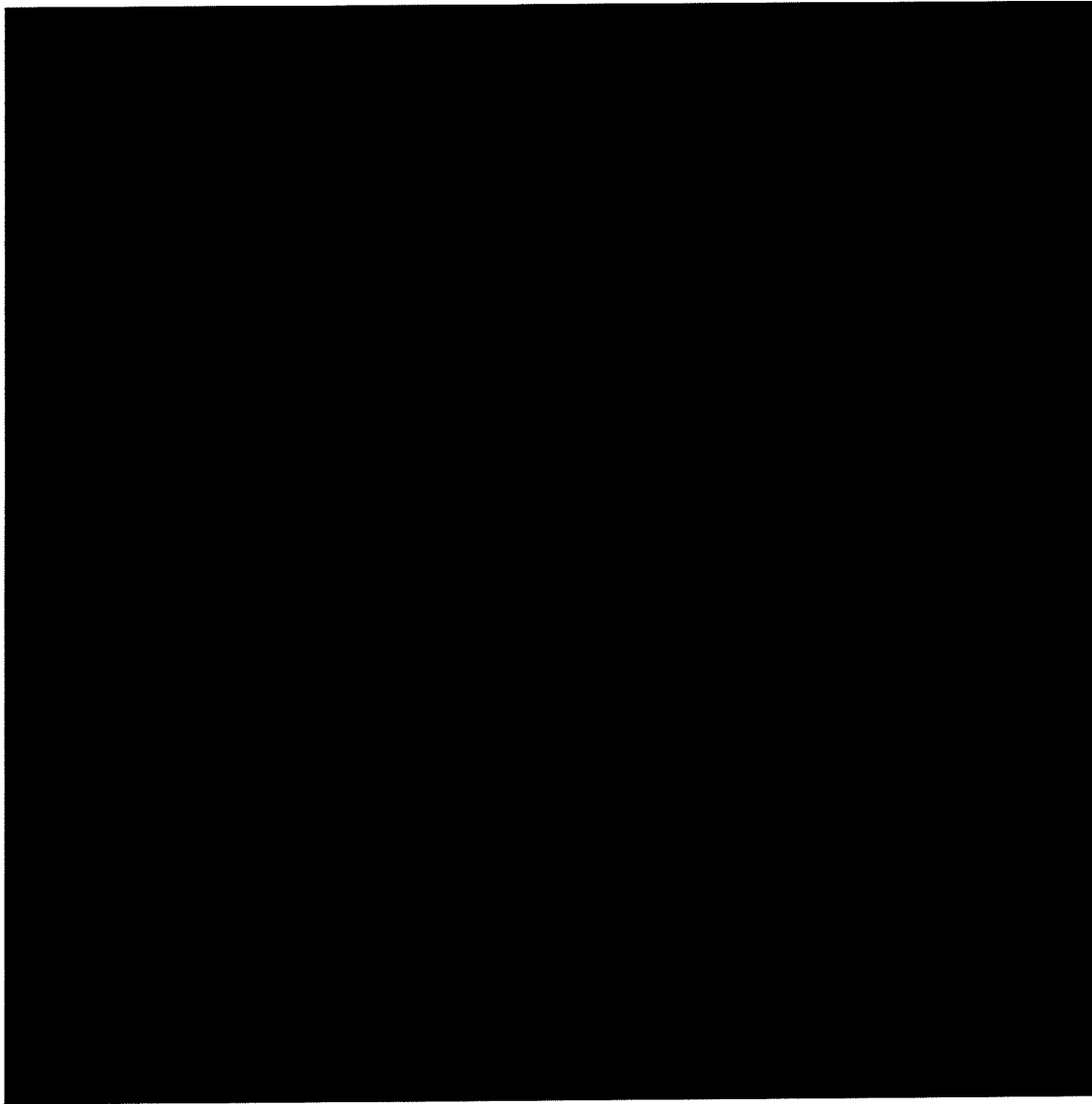


67.

[Redacted]

[Redacted]

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68.

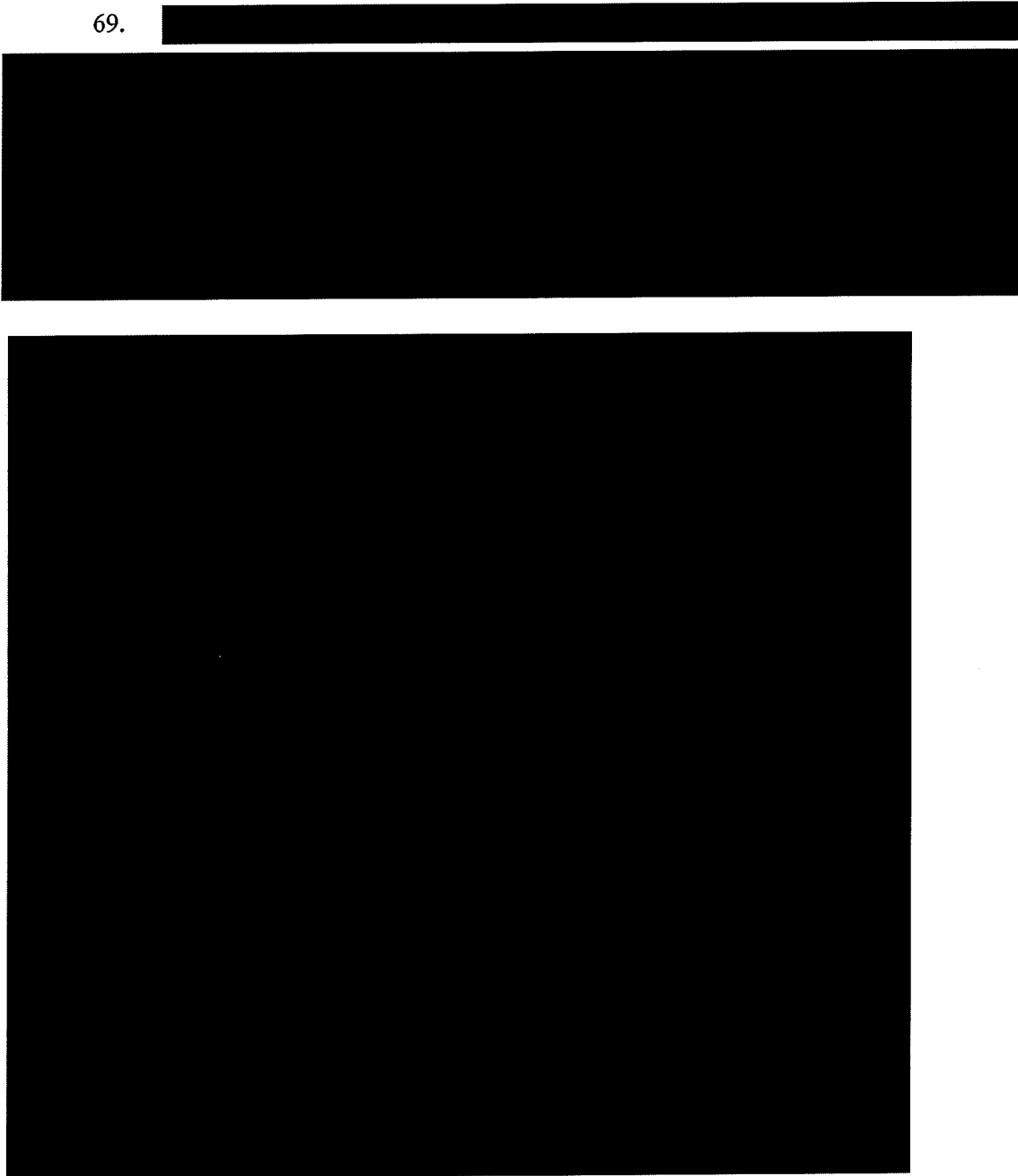
[REDACTED]

[REDACTED]

[REDACTED]

EXPERT REPORT OF DR. BRAD A. MYERS ON INFRINGEMENT

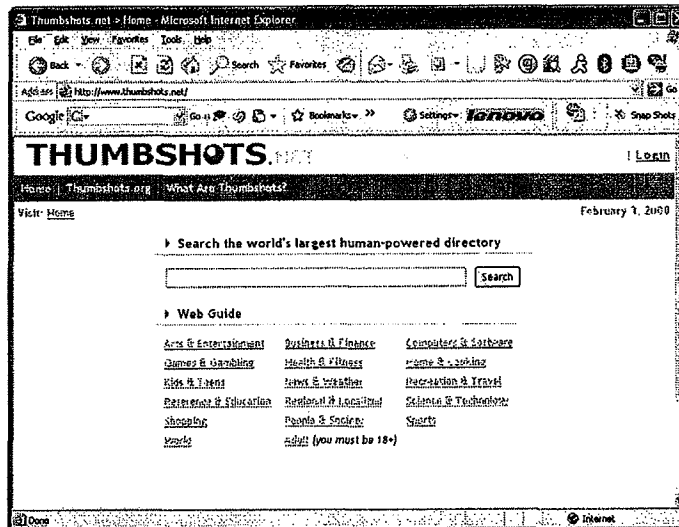
69.



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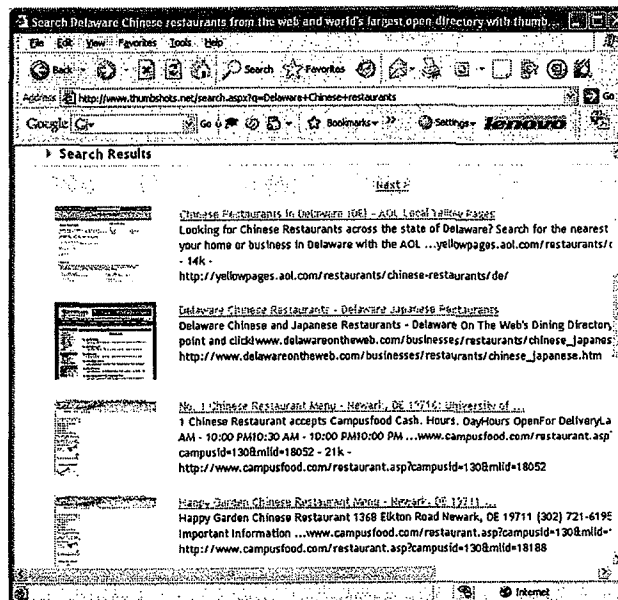
B. Smartdevil (Thumbshots)

70. I navigated to <http://www.thumbshots.net/> on January 31, 2008 and on February 3, 2008 using Internet Explorer version 6.0, and analyzed the system, taking screen shots shown below and the claim chart in Exhibit G.



www.thumbshots.net home page, captured February 3, 2008; see also Exhibit N-13

71. Below is a screen shot of Smartdevil (Thumbshots) providing a web page and thumbnail images; see also a full-size picture in Exhibit N-9. See my detailed analysis in Exhibit G.



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C. [REDACTED]

72. [REDACTED]

[REDACTED]

[REDACTED]

73. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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D. [REDACTED]

74. [REDACTED]

75. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

E. [REDACTED]

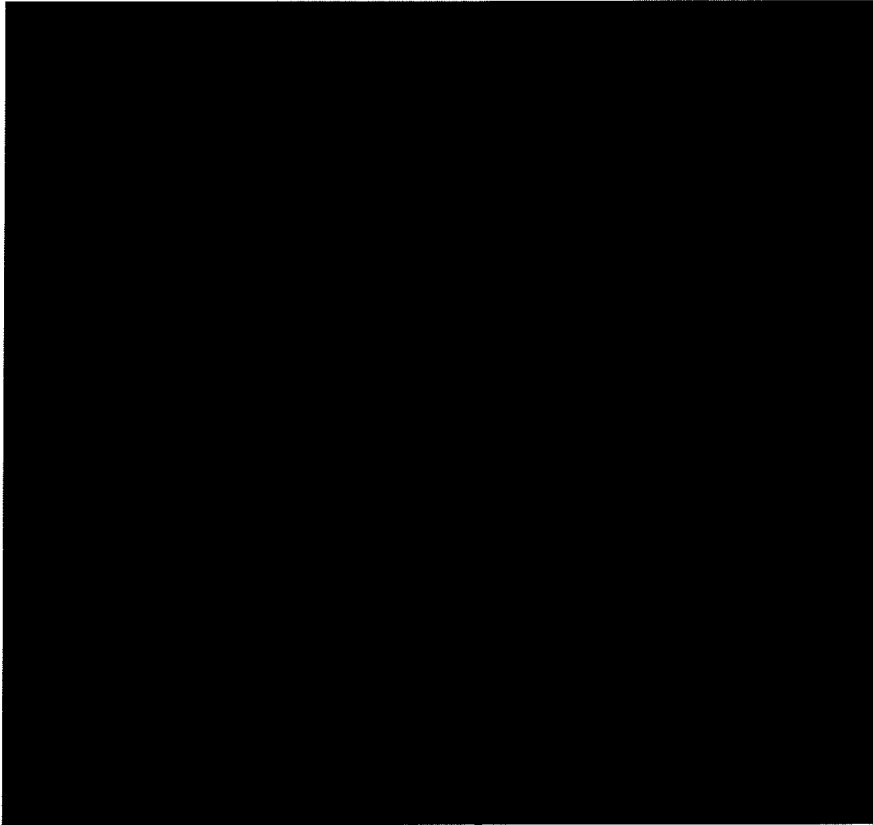
76. [REDACTED]

[REDACTED]

77. [REDACTED]

[REDACTED]

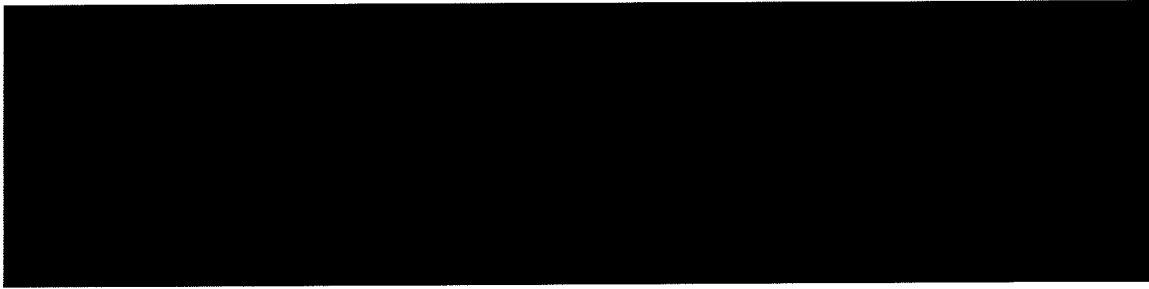
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F. 

78. 



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G. [REDACTED]

79. [REDACTED]

[REDACTED]

[REDACTED]

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80.

[REDACTED]

[REDACTED]

[REDACTED]

H.

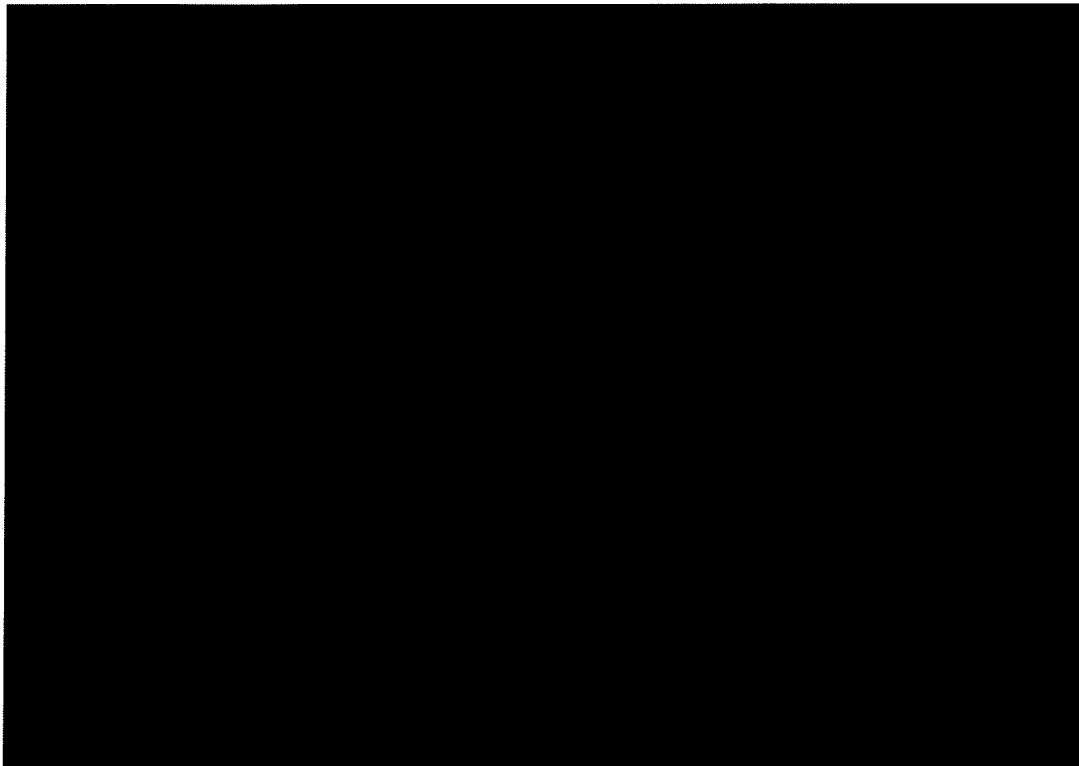
[REDACTED]

81.

[REDACTED]

[REDACTED]

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82. I expect to testify at trial consistent with the opinions expressed in this report.

Dated: February 12, 2009

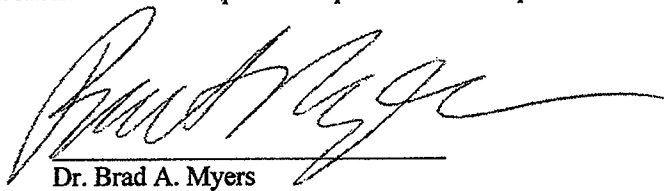
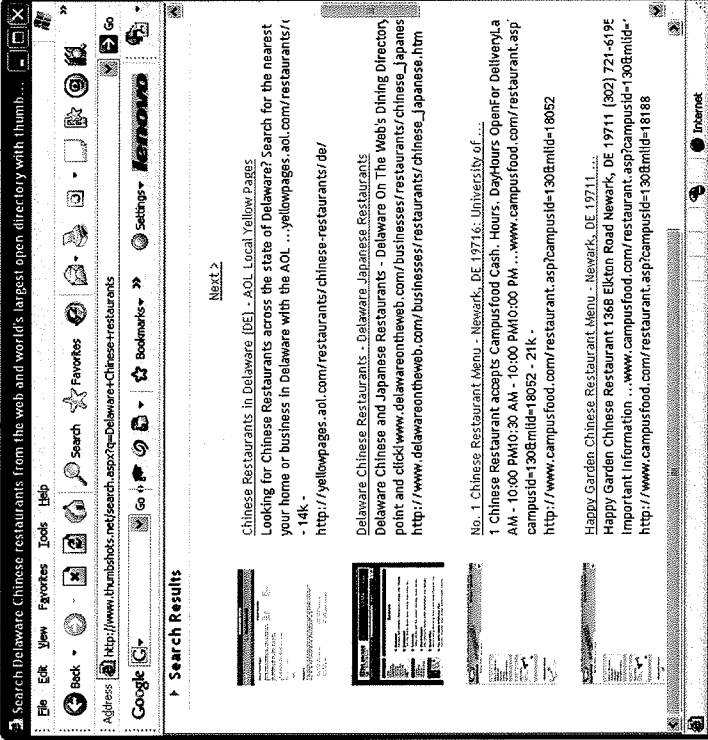
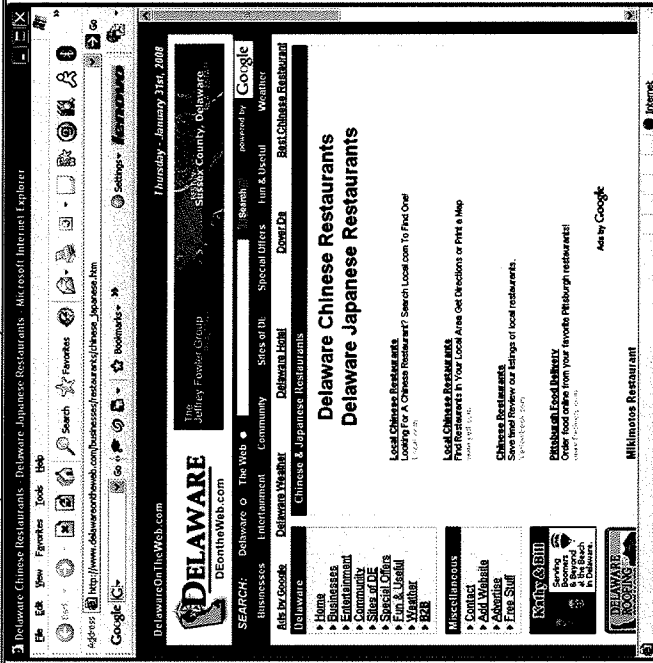

Dr. Brad A. Myers

EXHIBIT B

Exhibit G: Claim Chart Comparing USP 6,864,904 to Smartdevil (Thumbshots)

Claim	Smartdevil (Thumbshots)
<p>Claim 1</p> <p>A method for presenting Internet information to a user comprising:</p> <p>providing to a user a visual image of a web page containing at least one hyperlink; and</p> <p>at least partially concurrently providing a thumbnail visual image of the home page of at least one web site which is represented by said at least one hyperlink via the Internet</p>	<p>Starting from the web site http://www.thumbshots.net/ on January 31, 2008 using Internet Explorer version 6.0. Typing "Delaware Chinese restaurants" into the search box. Scrolling down, we find the search results, each of which is accompanied by a thumbnail: (See full-size picture in Exhibit N-9.)</p>  <p>The thumbnail shown for the second link is the image for the home page of http://delawareontheweb.com/, which is <i>different</i> from where the link references, which is http://www.delawareontheweb.com/businesses/restaurants/chinese_japanese.htm shown below. The web page and the thumbnail are visible concurrently, as shown by the picture above.</p>

Claim**Smartdevil (Thumbnails)**

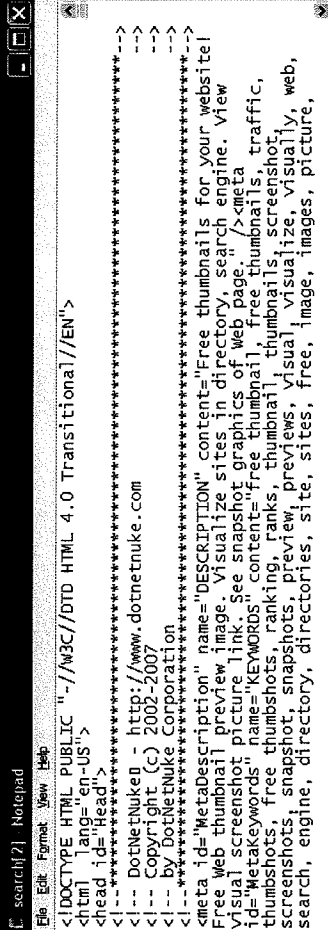
(See full-size picture in Exhibit N-10.)

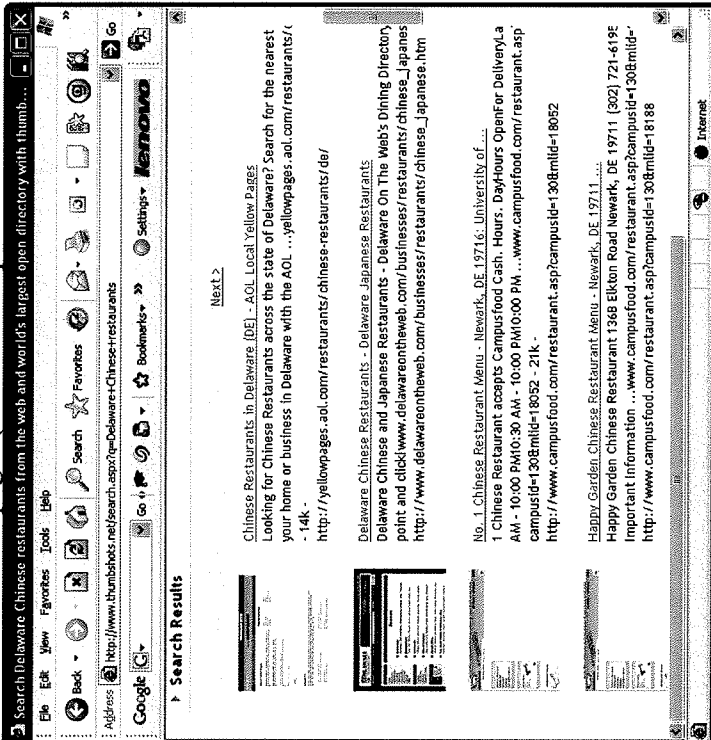
Apparently, after a time, <http://www.thumbnails.net/> will create a thumbnail of the target page, so the same search performed later will use a thumbnail of the actual target page.

Right clicking on the thumbnail picture, and selecting "Properties" (see screen shot below), reveals that the Address for the picture comes from the host simple.thumbnails.com which is different from the address of www.thumbnails.net and from the target web page of www.delawareontheweb.com. The image server is apparently simple.thumbnails.com.

by employing an image server that stores and provides said thumbnail visual image.

Claim	Smartdevil (Thumbnails)
	<p>The screenshot shows the "Properties" window for a file named "image.aspx?cid=803&v=1&url=http%3a%2f%2fwww.delawareontheweb.com%2fbusinesses%". The General tab is selected, displaying a small icon of the image. Below it, the following information is listed:</p> <ul style="list-style-type: none"> Protocol: HyperText Transfer Protocol Type: JPEG Image Address (URL): http://simple.thumbsnshots.com/image.aspx?cid=803&v=1&url=http%3a%2f% Size: 3776 bytes Dimensions: 120 x 90 pixels Created: 1/31/2008 Modified: 1/31/2008 <p>Buttons at the bottom include OK, Cancel, and Apply.</p> <div>(See full-size picture in Exhibit N-11.)</div>
Claim 4	
A method according to claim 1 and wherein said thumbnail visual image is displayed within the visual image of said web page.	The thumbnail is displayed within the display of the web page.
Claim 6	
A method according to claim 1 and wherein a plurality of thumbnail visual images represented by at least one hyperlink are displayed simultaneously along with said visual image of a web page	Multiple thumbnails are shown, each representing a different hyperlink (see picture above).

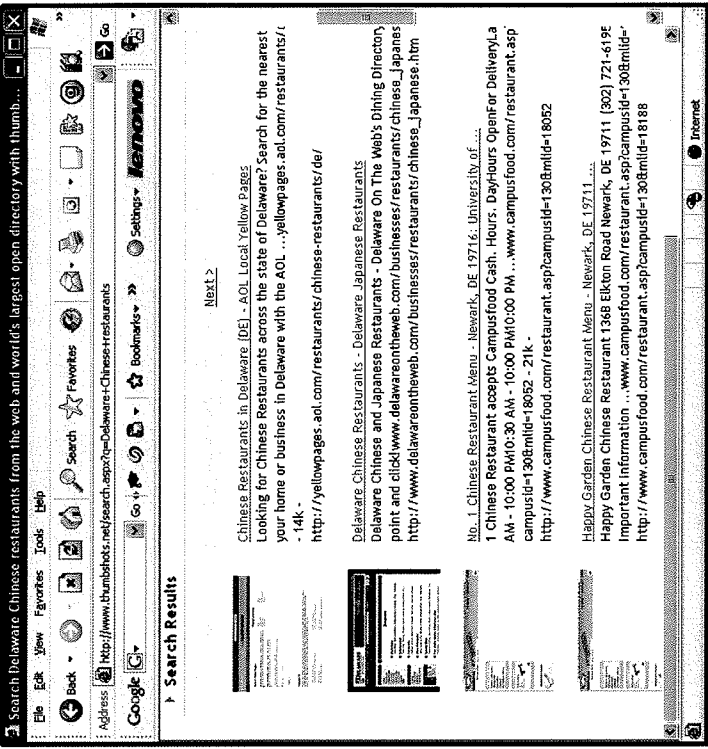
Claim	Smartdevil (Thumbnails)
containing at least one hyperlink.	
Claim 7	
A method according to claim 1 and wherein said web page comprises an HTML page.	<p>The web page is html. Here is the start of the source for the html of the web page shown above: (See full-size picture in Exhibit N-12.)</p>  <pre> <!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.0 Transitional//EN"> <html lang="en-US"> <head id="Head"> <!-- ***** <!-- by DotNetNuke Corporation <!-- <meta id="MetaDescription" name="DESCRIPTION" content="Free thumbnails for your website! Free Web thumbnail preview image. Visualize sites in directory, search engine. View Visual screenshots picture link. See snapshot graphics of web page." /> <meta id="MetaKeywords" name="KEYWORDS" content="Free thumbnail free thumbnails, thumbnails, free thumbnails ranking, ranks, thumbnail thumbnails, screenshots, screenshots, snapshot, snapshots, preview, previews, visual, visualize, visually, web, search, engine, directory, directories, site, sites, free, image, images, picture, </pre>
Claim 12	
A method according to claim 1 and wherein said providing a thumbnail visual image comprises: employing a web browser which interfaces via the Internet with a web server including visualization functionality.	<p>Thumbnails is used with Web browsers, such as Internet Explorer 6.0 that I used, which connects to the web server over the internet. Thumbnails includes the visualization functionality on its servers to display the thumbnails.</p>

<p>Claim</p>	<p>Smartdevil (Thumbnails)</p>
<p>Claim 13</p> <p>A method according to claim 12 and wherein said visualization functionality is operative to embed commands to the web browser to download, via said image server, thumbnail visual images of web pages which represent hyperlinks contained in the web page and to provide to a user, via the web browser, an annotated web page.</p>	<p>The web server has embedded commands in the web page to download the thumbnails for each hyperlink from the image server simple.thumbnails.com. The screenshot shows the annotated web page: (See full-size picture in Exhibit N-9.)</p> 
<p>Claim 14</p> <p>A method according to claim 13 and wherein said annotated web page includes the web page having within it thumbnail visual images of homepages of web sites referenced by hyperlinks contained in the web page.</p>	<p>The thumbnail of the home page is displayed within the display of the web page.</p>

Claim	Smartdevil (Thumbshots)
Claim 18	
A system for presenting Internet information to a user comprising: first functionality providing to a user a visual image of a web page containing at least one hyperlink; and second functionality operative at least partially concurrently with said first functionality for providing a thumbnail visual image of the home page of at least one web site which is represented by said at least one hyperlink via the Internet by employing an image server that stores and provides said thumbnail visual image.	Thumbshots provides a system that meets this limitation. See claim 1.
Claim 21	
A system according to claim 18 and wherein said thumbnail visual image is displayed within the visual image of said web page.	Thumbshots provides a system that meets this limitation. See claim 4.
Claim 23	
A system according to claim 18 and wherein a plurality of thumbnail visual images represented by at least one hyperlink are displayed simultaneously along with said visual image of a web page containing at least one hyperlink.	Thumbshots provides a system that meets this limitation. See claim 6.
Claim 24	
A system according to claim 18 and	Thumbshots provides a system that meets this limitation. See claim 7.

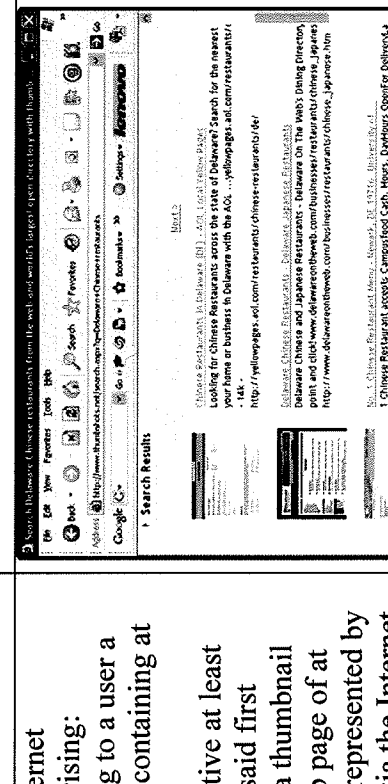
Exhibit G

Claim	Smartdevil (Thumbshots)
wherein said web page comprises an HTML page.	
Claim 29	
A system according to claim 18 and wherein said second functionality comprises fourth functionality employing a web browser which interfaces via the Internet with a web server including visualization functionality.	Thumbshots provides a system that meets this limitation. See claim 12.
Claim 30	
A system according to claim 29 and wherein said visualization functionality is operative to embed commands to the web browser to download, via said image server, thumbnail visual images of web pages which represent hyperlinks contained in the web page and to provide to a user, via the web browser, an annotated web page.	Thumbshots provides a system that meets this limitation. See claim 13.
Claim 31	
A system according to claim 30 and wherein said annotated web page includes the web page having within it thumbnail visual images of homepages of web sites referenced by hyperlinks contained in the web page.	Thumbshots provides a system that meets this limitation. See claim 14.

<p>Claim</p> <p>Claim 35</p> <p>A method for presenting Internet information to a user comprising: providing to a user a visual image of a web page containing at least one hyperlink; and at least partially concurrently providing a thumbnail visual image of another web page of at least one web site which is represented by said at least one hyperlink via the Internet by employing an image server that stores and provides said thumbnail visual image, said providing a thumbnail visual image comprising employing a web browser which interfaces via the Internet with a web server, separated from said image server, including visualization functionality, said visualization functionality being operative to embed commands to the web browser to download, via said image server, thumbnail visual images of web pages which represent hyperlinks contained in the web page and to provide to a user, via the web browser, an annotated web page.</p>	<p>Smartdevil (Thumbnails)</p>  <p>(See full-size picture in Exhibit N-9.)</p> <p>In the Thumbnails system, the thumbnail images on the left can show the home page (http://www.delawareontheweb.com) for the hyperlink on "Delaware Chinese Restaurants - Delaware Japanese Restaurants", which is http://www.delawareontheweb.com/businesses/restaurants/chinese_japanese.htm. The web browser (IE 6.0 here) uses the Internet to interface with www.thumbshots.net (the web server), which is apparently separate from the image server www.thumbshots.net. The screenshot shows the annotated web page where the thumbnail is visible concurrently with the web page (see also claim 1).</p>
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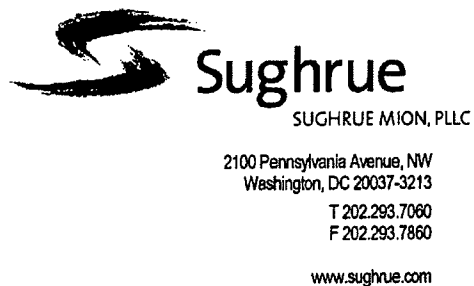
Claim	Smartdevil (Thumbshots)
Claim 38 A method according to claim 35 and wherein said thumbnail visual image is displayed within the visual image of said web page.	The thumbnail is displayed within the display of the web page (see also claim 4)
Claim 40 A method according to claim 35 and wherein a plurality of thumbnail visual images represented by at least one hyperlink are displayed simultaneously along with said visual image of a web page containing at least one hyperlink.	Multiple thumbnails are shown, each representing a different hyperlink (see also claim 6).
Claim 41 A method according to claim 35 and wherein said web page comprises an HTML page.	The web page is html (see also claim 7).
Claim 42 A method according to claim 35 and wherein said annotated web page includes the web page having within it thumbnail visual images of homepages of web sites referenced by hyperlinks contained in the web page.	Multiple thumbnails are shown, each representing a different hyperlink (see also claim 6), which can be homepages (see also claim 1).
Claim 44 A method according to claim 35 and wherein said visualization functionality comprises: receiving a list of hyperlinks;	Thumbshots is finding the page to display by splitting and trimming the URL of the hyperlink – by removing the businesses/restaurants/chinese_japanese.htm part, which is the path part, from the delawareontheweb.com which is the host part, as shown above for claim 1.

Exhibit G

<p>Claim</p> <p>splitting a URL of each hyperlink into URL components including at least a path component and a host component; trimming a path component based on the consideration of finding the most representative image of a given web page; and</p> <p>constructing a new URL including a trimmed path component.</p> <p>Claim 46</p> <p>A system for presenting Internet information to a user comprising: a first functionality providing to a user a visual image of a web page containing at least one hyperlink; and</p> <p>second functionality operative at least partially concurrently with said first functionality for providing a thumbnail visual image of another web page of at least one web site which is represented by said at least one hyperlink via the Internet by employing an image server that stores and provides said thumbnail visual image, said second functionality comprising third functionality employing a web browser which interfaces via the Internet with a web server, separated from said image server, including visualization functionality, said visualization functionality being operative to embed commands to the web browser to download, via said image server, thumbnail visual images of web</p>	<p>Smartdevil (Thumbnails)</p>  <p>(See full-size picture in Exhibit N-9.)</p> <p>In The Thumbnails system, the thumbnail images on the left can show the home page (http://www.delawareontheweb.com/) for the hyperlink on “Delaware Chinese Restaurants - Delaware Japanese Restaurants”, which is</p> <p>http://www.delawareontheweb.com/businesses/restaurants/chinese_japanese.htm. The image comes from the host http://www.delawareontheweb.com/ (IE 6.0 here) uses the Internet to interface with www.thumbnails.net (the web server), which is apparently separate from the image</p>
--	---

Claim	Smartdevil (Thumbnails)
pages which represent hyperlinks contained in the web page and to provide to a user, via the web browser, an annotated web page.	server simple.thumbnails.com . The web server has embedded commands in the web page to download the thumbnails. The screenshot shows the annotated web page (see also claim 35).
Claim 49	
A system according to claim 46 and wherein said thumbnail visual image is displayed within the visual image of said web page.	The thumbnail is displayed within the display of the web page (see also claim 4)
Claim 51	
A system according to claim 46 and wherein a plurality of thumbnail visual images represented by at least one hyperlink are displayed simultaneously along with said visual image of a web page containing at least one hyperlink.	Multiple thumbnails are shown, each representing a different hyperlink (see also claim 40).
Claim 52	
A system according to claim 46 and wherein said web page comprises an HTML page.	The web page is html (see also claim 7).
Claim 53	
A system according to claim 46 and wherein said annotated web page includes the web page having within it thumbnail visual images of homepages of web sites referenced by hyperlinks contained in the web page.	Multiple thumbnails are shown, each representing a different hyperlink, which can be homepages (see also claim 42).

EXHIBIT C



DEBIT NOTE NO:

DATE:

CLIENT NO:

OUR REF:

YOUR REF:

RE:

813364

October 31, 2009

132945

L10590

Ran 6,864,904

Litigation, Girafa v. Amazon et al.

Girafa.com, Inc.
1313 N. Market Street
Suite 5100
Wilmington, Delaware 19801

Shirli Ran, Chief Operating Officer

TO SERVICES:

09/11/09

09/22/09

10/01/09

10/02/09

Continued.....

[REDACTED]

[REDACTED]

Debit Note No: 813364
October 31, 2009

Page 2
Ran 6,864,904

10/05/09

10/06/09

10/07/09

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Debit Note No: 813364
October 31, 2009

Page 3
Ran 6,864,904

10/08/09

[REDACTED]

10/09/09

[REDACTED] (SXP 3.5 hrs);
[REDACTED]

10/12/09

[REDACTED]

10/13/09

[REDACTED]

10/14/09

[REDACTED]

10/15/09

[REDACTED] (SXP 2.0 hrs);
[REDACTED]

Continued.....

Debit Note No: 813364
October 31, 2009

Page 4
Ran 6,864,904

	[REDACTED]
10/16/09	[REDACTED]
10/19/09	[REDACTED]
10/20/09	[REDACTED]
10/21/09	[REDACTED]
10/22/09	[REDACTED]
10/26/09	[REDACTED]
10/30/09	[REDACTED]

Continued.....

Debit Note No: 813364
October 31, 2009

Page 5
Ran 6,864,904

Attorney	Hours	Rate	Fee
William H. Mandir			
John F. Rabena			
Carl J. Pellegrini			
Shahrazad Poormosleh			
Trevor Campbell Hill			
Chandran B. Iyer			
Ryan M. Corbett			
Paralegals			

Total Services:


\$ 

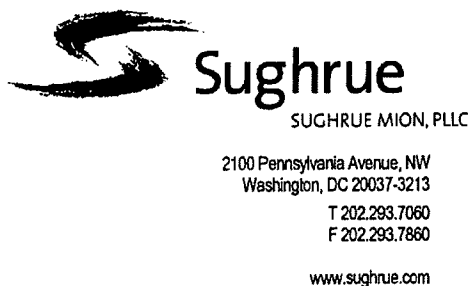
\$ 

TO DISBURSEMENTS:



AMOUNT DUE

\$ 



DEBIT NOTE NO:

DATE:

CLIENT NO:

OUR REF:

YOUR REF:

RE:

816008
November 30, 2009

132945

L10590

Ran 6,864,904

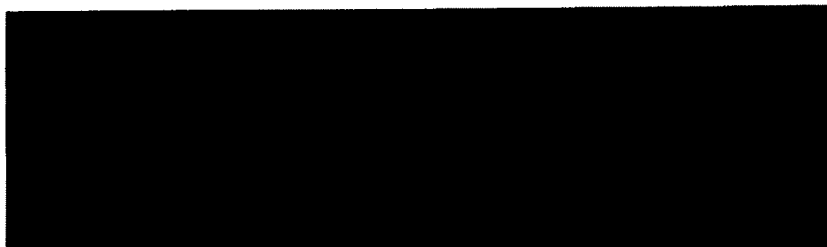
Litigation, Girafa v. Amazon et al.

Girafa.com, Inc.
1313 N. Market Street
Suite 5100
Wilmington, Delaware 19801

Shirli Ran, Chief Operating Officer

TO SERVICES:

11/02/09



11/03/09



11/04/09



11/05/09



11/06/09



11/09/09



Continued.....



Debit Note No: 816008
November 30, 2009

Page 2
Ran 6,864,904

11/10/09

[REDACTED]

11/11/09

[REDACTED]

11/16/09

[REDACTED]

11/17/09

[REDACTED]

11/19/09

[REDACTED]
[REDACTED] (WHM 1.0 hrs)

11/23/09

[REDACTED]

11/25/09

[REDACTED]
[REDACTED] (JFR 2.0 hrs)

11/30/09

[REDACTED]
[REDACTED]
[REDACTED] (RMC 4.5 hrs)

Continued.....

Debit Note No: 816008
November 30, 2009

Page 3
Ran 6,864,904

Attorney
William H. Mandir
John F. Rabena
Ryan M. Corbett
Paralegals
Patent Office Services

Hours	Rate	Fee
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

\$ [REDACTED]

\$ [REDACTED]

Total Services:

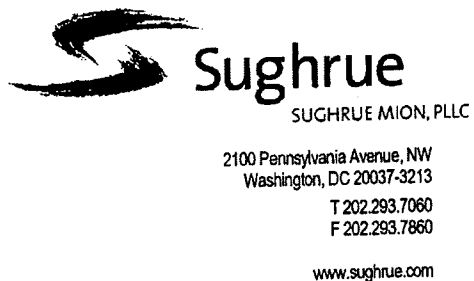
TO DISBURSEMENTS:

Duplication, postage and transportation
Telephone and facsimile
Outside Professional Services (Local Counsel Fees)
Courier
Automated Research (Lexis/Nexis legal research charges July
to October)

[REDACTED]

AMOUNT DUE

\$ [REDACTED]



DEBIT NOTE NO:

DATE:

CLIENT NO:

OUR REF:

YOUR REF:

RE:

819579

December 31, 2009

132945

L10590

Ran 6,864,904

Litigation, Girafa v. Amazon et al.

Girafa.com, Inc.
1313 N. Market Street
Suite 5100
Wilmington, Delaware 19801

Shirli Ran, Chief Operating Officer

TO SERVICES:

12/01/09

12/06/09

(JFR 1.0 hrs)

12/07/09

(RMC 2.5 hrs);

12/30/09

Attorney
William H. Mandir
John F. Rabena
Ryan M. Corbett
Paralegals

Hours	Rate	Fee

\$

\$

Total Services:

TO DISBURSEMENTS:

\$

AMOUNT DUE

Sughrue Mion, PLLC

Pre-Billing Report

Page: 1

Run : 01/21/10

132945 - Girafa.com, Inc.
 L10590 - Ran 6,864,904

Client: 132945 - Girafa.com, Inc.

Matter: L10590 - Ran 6,864,904

Bill Cycle:

Billing Date: 01/21/10

Fees Thru Date: 01/21/10

Cost Thru Date: 01/21/10

01/21/10

Girafa.com, Inc.
 1313 N. Market Street
 Suite 5100
 Wilmington, Delaware 19801

Shirli Ran, Chief Operating Officer

Date	Services	Hours	Amount	Event	Attorney	Code	Bill Amt
01/05/10	[REDACTED]						
01/08/10	[REDACTED]	JFR	1.20				
01/11/10	[REDACTED]	JFR	3.10				
01/12/10	[REDACTED]	JFR	4.60				
01/15/10	[REDACTED]	JFR	3.10				
01/20/10	[REDACTED]	JFR	0.80				
01/21/10	[REDACTED]	JFR	4.40				

Summary of services

Attorney	Total Hours	Total Amount	Rate
William H. Mandir			
John F. Rabena	17.20		

TOTAL FOR SERVICES

Billable time:

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2010, the attached **REDACTED**
PUBLIC VERSION OF DECLARATION OF RYAN M. CORBETT, ESQ. IN SUPPORT
OF PLAINTIFF GIRAFA.COM, INC.'S MOTION FOR ENTRY OF DEFAULT
JUDGMENT AGAINST DEFENDANT SMARTDEVIL, INC. was served upon the below-named counsel of record at the address and in the manner indicated:

Stephen Lim
stephen@smartdevil.com

VIA ELECTRONIC MAIL

Justin Lim
jhlhim@smartdevil.com

VIA ELECTRONIC MAIL

Jeffrey L. Moyer, Esquire
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HAND DELIVERY

Claude M. Stern, Esquire
Quinn Emanuel Urquhart Oliver & Hedges, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

VIA ELECTRONIC MAIL

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon